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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SKYWEST PILOTS ALPA ORGANIZING  
COMMITTEE, *et al.*,

Plaintiffs,

vs.

SKYWEST AIRLINES, INC.,

Defendant.

E-filing

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CASE NO.

2688

DECLARATION OF  
CHARLES "PHIL" ALFORD IN  
SUPPORT OF TEMPORARY  
RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION

**Declaration of Charles "Phil" Alford**

1. My name is Charles "Phil" Alford. I have been an airline pilot employed by SkyWest Airlines since January, 1983. I currently serve as an RJ captain based in Salt Lake City, UT.

2. I have been an open and active member of the SkyWest Pilots ALPA Organizing Committee (the "OC") since August 2006. The OC was formed to encourage the pilots of SkyWest to elect ALPA as their collective bargaining representative. The pilots of SkyWest are not represented by a labor union for collective bargaining purposes.

3. On December 22, 2006, at around 2:00 PM local time, I took a series of pictures in the crew lounge at Salt Lake City International Airport. The pictures are of various bulletin boards in the crew lounge. The crew lounge is an area of the crew room that contains a number of couches and tables at which pilots relax and eat meals.

4. The pictures demonstrate the wide variety of solicitations that are commonly posted in the crew lounges. Clear in the pictures are solicitations for crash pads, motor vehicles, dogs for adoption, and others. Many pilots also use the boards to advertise side businesses that they operate.

5. One of the photos shows a file cabinet on which communications from SAPA regularly are made available to the pilot group. SAPA is the SkyWest Airlines Pilots Association, a group formed and funded by SkyWest management that claims to represent pilot interests before management. SAPA is not certified by the National Mediation Board and does not have the right to collectively bargain on behalf of the pilots. One of the documents shown here is a "Pilot Pay Package" offered by the company to the pilots in November 2006 through SAPA and put out to the pilots for their consideration and ratification. Copies of that document were left in the crew room routinely with the apparent approval of management.

6. On April 2, 2007, fellow OC member Tracy Shrier and I, along with other pilots who are ALPA

supporters, went to the SkyWest hangar at Salt Lake City International Airport to hand out fliers advertising an ALPA information session to be held that evening. The hangar is where SkyWest conducts all of its training classes. We arrived at the hangar at around 3:30 PM and began to hand out fliers to pilots who were exiting their classes for the day. We remained on the sidewalk and did not attempt to enter the building.

7. At around 4:00 on that afternoon, Capt. Shane Losee, SkyWest Director of Training, came out of the hangar and approached us. Capt. Losee said that he had been ordered by Capt. Dave Faddis, SkyWest Director of Flight Standards, to tell us to leave the property. He informed us that we would not be allowed to distribute information to pilots while on SkyWest property.

8. The combined effect of these actions by management representatives has been to prevent me from freely expressing my view that the pilots of SkyWest would benefit from electing ALPA as their collective bargaining representative, and to discourage me from

attempting to provide information to other pilots or encourage them to inquire about the benefits of representation.

Under penalty of perjury, I affirm that the information herein is complete and accurate to the best of my ability and recollection.

May 11, 2007  
Date

Charles Alford  
Charles "Phil" Alford